RSR CORPORATION

March 26, 1993

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RE: March 1993 Quarterly Groundwater Monitoring Report

Ladies and Gentlemen:

On behalf of Quemetco, Inc. (Quemetco) enclosed please find the referenced report for your review. Additionally, please find an attachment which provides a response to comments contained in a letter from Ms. Karen Schwinn of USEPA dated December 15, 1992, pertinent to the September 1992 Groundwater Monitoring Report.

Should you have any questions or require additional information, please call either Steve Reynolds or me at (214) 631-6070.

Respectfully submitted,

Gerald A. Dumas
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GAD/mc

Enclosure

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ATTACHMENT

RESPONSE TO COMMENTS
QUARTERLY GROUNDWATER MONITORING REPORT
(dated September 28, 1992)

This attachment provides responses to comments contained in the December 15, 1992, letter from USEPA to Mr. Gerald Dumas of RSR Corporation pertaining to the above referenced report.

1. Comment: In future sampling reports, Quemetco should indicate the purge and sample pumping rates on the field log sheets. In general high pumping rates should be avoided to prevent suspended colloidal materials and cascading water in the wells from compromising sampling results.

   Response: As included in the December 29, 1992, quarterly report and all subsequent reports the purge rate will be calculated from the data on the field log sheets and included in the comments section. Sampling is conducted using disposable bailers therefore sampling rates are not applicable. High pumping rates will be avoided to minimize sampling effects described in the comment.

2. Comment: The bottom of the second page in Appendix A indicates that MW-7 was pumped to dryness twice and provides the depth to water (DTW) for both occasions. The DTW figures at dryness do not appear to agree with the depth of the pump intake. In future reports, greater effort should be taken to assure consistency among these figures.

   Response: The discrepancies between the DTW measurements and the depth of the pump intake for MW-7 in Appendix A are due to typographical errors. The correct depth to water values of dryness are 37.10 feet and 37.15 feet.

3. Comment: Mercury was included in the total metals analyses, but was not included in the dissolved metals analyses. It is assumed that this omission is due to an accidental oversight which will not be repeated. Both total and dissolved mercury analysis must be included in all future ground water monitoring reports.

   Response: Mercury was included in the dissolved metals analyses, however to avoid confusion, subsequent reports beginning with the December 29, 1992 report, will list mercury in correct alphabetical position.

4. Comment: Total Organic Carbon (TOC) concentrations in MW-9 were significantly higher than at the other wells during the September 1992 sampling. Moreover, all of the TOC concentrations for September were significantly higher than observed in previous sampling events. Although it is too early to speculate seriously about these TOC levels, they could be indicative of organic contaminants. If this trend does continue, the analyte list may need to be expanded to include organic constituents.

Response: Based on sampling results from November 1992 and February 1993, the TOC results for September 1992 appear to be anomalous. These data are essentially one order of magnitude higher than previous and subsequent data. The most likely explanation for these values is an error in laboratory calculations and/or procedures. The contract laboratory has investigated this possibility but has yet to determine a source for this anomaly.

5. Comment: The first page of matrix spike/matrix spike duplicate (MS/MSD) analyses in Appendix B includes some calculation steps that are unclear. For mercury, this page states that 0.0024 mg/l of a total 0.0025 mg/l of the MS spike compound was recovered. This suggests a recovery rate of 96%, but the table lists 78%. Similar apparent discrepancies exist on this page and in subsequent pages. In future reports, additional steps should be taken to clarify these calculations and prevent errors.

Response: Percent recovery is calculated by subtracting the sample concentration from the matrix spike/matrix spike duplicate concentration to determine the total recovered concentrations. The total recovered concentrations are then divided by the spiked concentrations to calculate percent recovery.

6. Comment: Although Quemetco collected a trip blank, it was not analyzed. In addition no equipment blanks were collected. In the future, Quemetco should collect and analyze at least one trip blank per each quarterly sampling event and one equipment blank per each day of sampling within that event. These protocols are consistent with the February 25, 1991 Ground Water Monitoring Plan and March 12, 1992 Surface Impoundment Closure Plan prepared for Quemetco by Environmental Strategies Corporation.

Response: As indicated in the proposed groundwater monitoring plan contained in the June 16, 1992 Surface Impoundment Closure Plan, equipment blanks will not be collected when dedicated disposable sampling equipment is utilized. In addition, RSR has directed ESC to include collection and analyses of a trip blank in accordance with the proposed plan in future sampling events.

7. Comment: There is a misprint in Table 6; the dissolved iron concentration should be 0.61 mg/l rather than 0.061, assuming that the analytical data sheet in Appendix A is correct. Greater attention to proofreading is in order, to minimize errors of this sort in the future.

Response: As noted by EPA, there is a typographical error in Table 6 of the September 1992 report. The correct dissolved iron concentration for MW-10 is 0.61 mg/l, not 0.061 mg/l, as reported.